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10 IN THE UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA
12

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 APPROXIMATELY \$879,643.00 IN
U.S. CURRENCY,

17 ASSORTED MONEY ORDERS VALUED
18 AT \$6,000.00 IN U.S. CURRENCY,

19 Defendants.
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2:21-MC-00097-MCE-KJN

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

21 It is hereby stipulated by and between the United States of America and potential claimants Maria
22 Gonzalez Sanchez and Jose Luis Mendoza Castillo (“claimants”), by and through their respective
23 counsel, as follows:

24 1. On or about January 3, 2021 and January 11, 2021, claimants filed claims in the
25 administrative forfeiture proceeding with the Federal Bureau of Investigation with respect to the
26 Approximately \$879,643.00 in U.S. Currency and Assorted Money Orders valued at \$6,000.00 in U.S.
27 Currency (hereafter collectively “defendant funds”), which were seized on or about October 1, 2020.

28 2. The Federal Bureau of Investigation has sent the written notice of intent to forfeit required

1 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a
2 claim to the defendant funds under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimants has
3 filed a claim to the defendant funds as required by law in the administrative forfeiture proceeding.

4 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
5 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are
6 subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
7 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
8 That deadline was April 2, 2021.

9 4. By Stipulation and Order filed April 12, 2021, the parties stipulated to extend to July 1,
10 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
11 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

12 5. By Stipulation and Order filed July 21, 2021, the parties stipulated to extend to August 30,
13 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
14 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

15 6. By Stipulation and Order filed August 31, 2021, the parties stipulated to extend to
16 September 29, 2021, the time in which the United States is required to file a civil complaint for forfeiture
17 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
18 forfeiture.

19 7. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend
20 to November 29, 2021, the time in which the United States is required to file a civil complaint for
21 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are
22 subject to forfeiture.

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3 8. Accordingly, the parties agree that the deadline by which the United States shall be
4 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment
5 alleging that the defendant funds are subject to forfeiture shall be extended to November 29, 2021.

6 Dated: 9/29/2021

PHILLIP A. TALBERT
Acting United States Attorney

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8 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

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10 Dated: 9/29/2021

/s/ Kenneth Rosenfeld
KENNETH ROSENFELD
Attorney for potential claimant
Maria Gonzalez Sanchez


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12
13 Dated: 9/29/2021

/s/ Allen N. Sawyer
ALLEN N. SAWYER
Attorney for potential claimant
Jose Luis Mendoza Castillo

(Signatures authorized by email)

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17 IT IS SO ORDERED.

18 Dated: September 30, 2021

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MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE